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November 30, 2009

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The Honorable Catherine C. Blake
United States District Court
for the District of Maryland
101 West Lombard Street, Room 110
Baltimore, Maryland 21201

Re: Canton Port Services, LLC v. M/V SNOW BIRD, etc., et al.
Civil Action No. 1:09-cv-02452-CCB

Dear Judge Blake:

We represent Vespucci Marine Company, Ltd., the former owner of the M/V SNOW BIRD. The status of the case from our standpoint is that the vessel was sold for \$86,000, and the sale was confirmed. Various claims have been filed against the proceeds. On November 25, 2009 Canton filed a Motion to Pay *In Custodia Legis* expenses and other claims of Canton. These claims of priority will have to be resolved in due course as there are other plaintiffs who have intervened.

However, there are two Motions still pending:

1. Vespucci's Motion to Vacate the Rule B attachment; and
2. Canton's Motion for Security for costs.

We believe both Motions have been fully briefed, although no argument has been scheduled as of yet. With respect to the Motion to Vacate Canton's Attachment, so far as we are aware, only Ocean Ship, Inc., the SNOW BIRD's agent, and Wright, Constable & Skeen, LLP, Vespucci's attorney, have filed answers as garnishees. Neither entity was holding property of Vespucci or any

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other entities. Wachovia Bank, the remaining garnishee, has not been heard from. In any event, Vespucci would like to have the Rule B attachment vacated and dismissed as to the garnishees.

Very truly yours,

/s/

David W. Skeen

cc: J. Stephen Simms, Esq.
Robert P. O'Brien, Esq.

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